

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his )  
capacity as ATTORNEY GENERAL )  
OF THE STATE OF OKLAHOMA and )  
OKLAHOMA SECRETARY OF THE )  
ENVIRONMENT C. MILES TOLBERT, )  
in his capacity as the )  
TRUSTEE FOR NATURAL RESOURCES )  
FOR THE STATE OF OKLAHOMA, )

Plaintiff, )

vs. )

4:05-CV-00329-TCK-SAJ

TYSON FOODS, INC., et al, )

Defendants. )

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THE VIDEOTAPED 30(b)(6)  
DEPOSITION OF STEVEN PATRICK, produced as a  
witness on behalf of the Plaintiff in the above  
styled and numbered cause, taken on the 21st day of  
August, 2007, in the City of Fayetteville, County of  
Washington, State of Arkansas, before me, Lisa A.  
Steinmeyer, a Certified Shorthand Reporter, duly  
certified under and by virtue of the laws of the  
State of Oklahoma.

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**EXHIBIT**

12

1 to any other sources where this information might be  
2 found, such as a university.

3 MR. GEORGE: David, is your question  
4 limited to studies relevant to the Illinois River  
5 watershed? 09:49AM

6 MR. RIGGS: I think it should be according  
7 to --

8 A Illinois River watershed? I am not aware.

9 Q Okay. Let's talk about the total amount of  
10 waste produced, not just what individual birds might  
11 produce in the form of excrement. Let's look at 09:49AM

12 Inquiry No. 11 now on that list, and I want you to  
13 tell me if you are the person designated to speak  
14 for the Tyson entities on that area and if you are  
15 prepared to do that. 09:49AM

16 A Yes to both.

17 Q Okay, and when I'm saying -- we're including  
18 Cobb-Vantress. I get a little confused about which  
19 witness is going to speak for them, but you're  
20 speaking for them and the three other Tyson 09:49AM  
21 entities; correct?

22 A Correct.

23 Q Does Tyson currently own, that is, any of  
24 those entities or directly operate or maintain  
25 houses in which their chickens are fed? 09:50AM

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1 watershed.

2 A Yes.

3 Q And what kind of birds were in those houses  
4 which were owned and operated by Tyson?

5 A Well, I think we would have had broilers. I 09:51AM  
6 believe that's what would have been in there, and I  
7 would need to go back to verify, but I'm pretty sure  
8 we had broilers in them.

9 Q Do you know if Tyson, during that time it was  
10 owning and operating its own broiler houses in the 09:51AM  
11 Illinois River watershed, ever weighed or measured  
12 the amount of waste coming out of those houses when  
13 it was removed?

14 A On weighing, I do not have records of them  
15 weighing what was coming out of the houses. I did 09:52AM  
16 not have that information.

17 Q Do you know if they did or didn't do that?

18 A I am not aware of any weighing that was  
19 conducted.

20 Q Do you know if they measured it some other 09:52AM  
21 way, such as a truck load or by cubic feet or  
22 anything like that?

23 A I have no information on any kind of weight or  
24 measurement of what was coming out of the houses at  
25 these specific locations we're talking about in the 09:52AM

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1 Illinois River watershed and the broiler houses.

2 Q Right. Do you know what type of equipment was  
3 used to remove that poultry waste from the floors of  
4 those houses?

5 A No. 09:52AM

6 Q Do you know what kind of truck was used to  
7 haul it, like the capacity of the truck or anything  
8 of that sort?

9 A No.

10 Q Do you know if Tyson had others remove the 09:52AM  
11 poultry waste from the houses where its broilers  
12 were maintained in the Illinois River watershed?

13 MR. GEORGE: David, is your question again  
14 limited to what was previously the company-owned and  
15 managed farms? 09:53AM

16 MR. RIGGS: Yes.

17 Q Not your growers' houses but that Tyson owned  
18 and operated houses.

19 A Can you repeat that question? I want to make  
20 sure I'm answering. 09:53AM

21 Q Yeah. I'm wondering if when the poultry waste  
22 was removed from those houses, the Tyson-owned and  
23 operated houses in the Illinois River watershed, if  
24 other companies or other parties were hired to  
25 remove that waste. 09:53AM

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